

## **REMARKS/ARGUMENTS**

Claims 1-17 remain in the application. Of these, claims 1-13 stand rejected, and claims 14-17 are newly presented.

Claims 1-12 have been amended. Support for some of the amendments to claims 1, 2, 7, 8 and 12 are found, at least, in paragraphs [0018] and [0021]. Other amendments to claims 1-12 are either clerical in nature, or are supported by the originally presented claims. Support for new claims 14-17 is found, at least, in originally presented claims 3, 5, 9 and 11. None of these amendments is believed to add new matter.

### **1. The Double Patenting Rejection of Claims 1-13**

Claims 1-13 stand rejected under the judicially created doctrine of double patenting over claims 1-10 of U.S. Pat. No. 6,651,118. In response to this rejection, Applicants enclose herewith a Terminal Disclaimer.

### **2. The Rejection of Claims 1-13 Under 35 USC 103(a)**

Claims 1-13 stand rejected under 35 USC 103(a) as being unpatentable over Terho et al. (US Pat. No. 6,119,180; hereinafter "Terho") in view of Gauvin et al. (US Pat. No. 5,790,800; hereinafter "Gauvin").

With respect to Applicants' claim 1, the Examiner asserts that Terho's computer 4 and mobile phone 6 are equivalent to Applicants' source and destination appliances. Although the Examiner does not specifically indicate which item disclosed by Terho is equivalent to Applicants' appliance communications manager, Applicants believe that, given the Examiner's characterization of Terho's computer 4 and mobile phone 6, the Examiner most likely believes Terho's data adapter 18 is equivalent to Applicants' appliance communications manager. Applicants disagree.

Terho's data adapter 18 is not equivalent to Applicants' appliance communications manager at least for the reason that Applicants' claim 1 specifies that an "appliance communications manager. . . **stands apart** from source and destination appliances" (emphasis added). Terho's data adapter 18 does not stand apart from Terho's computer 4, but rather is installed in Terho's computer 4. See Terho, col. 6, lines 42-44. Even if Terho's data adapter 18 could somehow function apart from computer 4 (which there is no indication it could), it is noted that Terho's data adapter 18 is designed to function between only a single source and destination (i.e., a computer 4 and a mobile phone 6). As amended, Applicants' claim 1 recites that an appliance communications manager 1) receives a connection request from a first of a number of source appliances, and 2) establishes a communication link with a first of a number of destination appliances. Applicants' claim 1 also recites that the appliance communications manager receives a connection request and establishes a communication link via the same or different ones of a plurality of different I/O communication modules of the appliance communications manager. In this manner, Applicants' method for communicating between source and destination appliances is accomplished via an appliance communications manager that conducts communications between various source and destination appliances.

Although the Examiner asserts that it would have been obvious to adapt Terho's communication method to appliance communication, Applicants disagree. The incorporation of different I/O communication modules into a stand-alone appliance communications manager is not believed to be obvious, as Terho apparently failed to recognize the usefulness of providing a stand-alone appliance communications manager that can interface with various and/or different types of appliances.

Applicants' claim 1 is believed to be allowable at least for the above reasons, and because Gauvin fails to disclose the elements of Applicants' claim not disclosed by Terho. Applicants' claims 2-6 are believed to be allowable at least for the reason that they depend from claim 1. It is also noted, however, that with respect to Applicants' claim 6, Terho does not disclose the use of an appliance communications manager (or even an installed data adapter 18) to communicate with a printer, scanner, facsimile machine, overhead projector, appliance storage device, or an

appliance whiteboard. Applicants believe it would not be obvious to extend Terho's teachings to these devices, because these devices are typically connected to a computer via cables, and these devices have not typically communicated with one another absent an intermediary computer.

Claims 7-13 are believed to be allowable at least for reasons similar to why claims 1-6 are believed to be allowable.

New claims 14-17 are derived from originally presented claims 3, 5, 9 and 11, and are believed to be allowable at least for the reason that they depend from claims 1 or 7.

### 3. Conclusion

Given the above Remarks, Applicants respectfully request the issuance of a Notice of Allowance.

Respectfully submitted,  
DAHL & OSTERLOTH, L.L.P.

By: 

\_\_\_\_\_  
Gregory W. Osterloth  
Reg. No. 36,232  
Tel: (303) 291-3200